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February 27, 2009

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, D.C. 20554

Re: EB Docket No. 06-36  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008

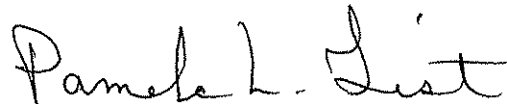
Progress International, LLC  
Form 499 Filer ID 825928

Dear Ms. Dortch:

On behalf of Progress International, LLC, and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carrier's CPNI certification for 2008 with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enclosures

cc: Enforcement Bureau, FCC (2)  
Best Copy and Printing, Inc. (1)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification:

Progress International, LLC  
Form 499 Filer ID 825928

Address: 1090 Old Katy Road  
Houston, Texas 77669


Name of signing officer: Robert K. Lacy

Title of signatory: CEO

CERTIFICATION

I, Robert K. Lacy, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement which (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received in the past year concerning the unauthorized release of CPNI.



Name: Robert K. Lacy

Title: CEO

Date: February 27, 2009

Company Name ("Carrier"): Progress International, LLC

### STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier does not provide end user services in the United States. Carrier provides services only to other carriers. Carrier does not use proprietary information for any other purpose than to provide service to other carriers.
- Carrier does not use proprietary information for its own marketing efforts. Carrier does not use, disclose or permit access to CPNI for the purpose of providing or marketing services of its affiliate or third parties.
- Carrier has substantial processes and controls for both physical security and access to data. Customers are provided services under contracts with express confidentiality provisions, and have dedicated account representatives with access to customer data.
- Carrier maintains and utilizes CPNI for the limited purposes of initiating, rendering, billing and collecting for its services, and may use CPNI, if necessary, to protect its property rights, or to protect other carriers from fraudulent, abusive or unlawful use of, or subscription to, Carrier's services.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.
- Carrier's customer service representatives do not have access to call detail information. Carrier ensures that access to all call detail information is safeguarded from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to this information. Carrier has instituted restrictions regarding access, use and disclosure of such records.
- Carrier does not disclose call record information over the telephone, or in person, and does not provide for customer on-line access to card or call information. Password and other authentication process are not applicable in this environment.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.

- Carrier took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: No actions taken
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: No information received
- The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:
  - Number of customer complaints Carrier received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: No complaints received
  - Category of complaint:
    - 0 Number of instances of improper access by employees
    - 0 Number of instances of improper disclosure to individuals not authorized to receive the information
    - 0 Number of instances of improper access to online information by individuals not authorized to view the information
    - 0 Number of other instances of improper access or disclosure
  - Summary of customer complaints received in 2008 concerning the unauthorized release of CPNI: Not Applicable